

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

In re SANDRIDGE ENERGY, INC.
SECURITIES LITIGATION

Case No. CIV-12-1341-G

This Document Relates To:

ALL ACTIONS.

**DEFENDANTS' MOTION TO STRIKE PORTIONS OF
BJORN I. STEINHOLT'S REBUTTAL EXPERT REPORT**

Pursuant to Federal Rules of Civil Procedure 26(a) and 37, Defendants Tom Ward, Matthew Grubb, James Bennett, and nominal defendant SandRidge Energy, Inc. (collectively "Defendants") respectfully move this Court for an order striking paragraphs 65 through 83 and Exhibit A of the Rebuttal Expert Report of Bjorn I. Steinholt.

An order striking these portions of Mr. Steinholt's "rebuttal" expert report is necessary because Mr. Steinholt introduces two new damages theories that go well beyond the scope of permissible rebuttal without any substantial justification. Absent relief, Defendants would be unduly prejudiced by the belated disclosure of Mr. Steinholt's new damages analysis. Defendants respectfully request the Court's prompt attention to this motion, and have separately moved for expedited briefing, because the deadline for the completion of expert discovery is June 19, 2019, and Mr. Steinholt's deposition is scheduled for June 12, 2019.

Pursuant to Local Rule 37.1, Defendants certify that they met and conferred telephonically in good faith with Plaintiffs' counsel on May 17, 2019. Because of the distance between Defendants' counsels' offices (in New York, New York; Washington, D.C.; and Oklahoma City, Oklahoma) and Plaintiffs' counsel's offices (in Melville, New York) and the urgency of this matter, a personal conference was not feasible. Despite these efforts to resolve this dispute, the parties were unable to reach agreement. However, the parties did agree to expedited briefing on Defendants' motion, with Plaintiffs' opposition due on May 24, 2019.

Dated: May 17, 2019

Respectfully submitted,

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